



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 3, 2017

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Kaleil Isaza Tuzman et al.,
S8 15 Cr. 536 (PGG)**

Dear Judge Gardephe:

The Government respectfully submits this letter jointly with counsel for defendants to update the Court on the status of privilege issues relating to the production of documents by Stephen Maiden (“Maiden”). The Government has recently received a production from the SEC with the remaining Maiden documents, including the approximately 6,600 documents that were incorrectly segregated and an additional approximately 2,000 documents over which Maiden is no longer asserting privilege. The Government is currently processing those documents and will produce them to counsel for defendants next week.

The parties are continuing their discussions regarding Maiden’s privilege invocations and whether further litigation on this issue will be necessary.

The parties respectfully propose to jointly update the Court on March 31, 2017.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/
Damian Williams/Andrea M. Griswold
Assistant United States Attorneys
(212) 637-2298/1205